IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE WAVE STUDIO, LLC,
 	
                        Plaintiff,
 	
        v.
 	
AMADEUS NORTH AMERICA, INC., et al.,
 	
                        Defendants.
	Civil Action No. 7:15-cv-06995-CS-VR

THE WAVE STUDIO, LLC,
 	
                        Plaintiff,
 	
        v.
 	
BRITISH AIRWAYS PLC, et al.
 	
                        Defendants.
	Civil Action No. 7:15-cv-07950-CS

THE WAVE STUDIO, LLC,
 	
                        Plaintiff,
 	
        v.
 	
BOOKING HOLDINGS INC., et al.
 	
                        Defendants.
	Civil Action No. 7:21-cv-02691-CS

THE WAVE STUDIO, LLC,
 	
                        Plaintiff,
 	
        v.
 	
CITIBANK, N.A., et al.
 	
                        Defendants.
	Civil Action No. 7:22-cv-05141-CS

**THE BOOKING HOLDINGS DEFENDANTS' NOTICE OF MOTION AND MOTION
TO DISMISS ON SPECIFIED GROUNDS PER COURT'S ORDERS**

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THE WAVE STUDIO, LLC,
               Plaintiff,
 	
 v.
 	
 PRICELINE.COM LLC, et al.,
               Defendants.
	Civil Action No. 7:15-cv-06995-CS

THE WAVE STUDIO, LLC,
               Plaintiff,
 	
 v.
 	
 HOTELS COMBINED LLC, et al.
 	
               Defendants.
	Civil Action No. 7:15-cv-07950-CS

THE WAVE STUDIO, LLC,
               Plaintiff,
 	
 v.
 	
 BOOKING HOLDINGS INC.; AGODA COMPANY PTE. LTD.; AGIP LLC; BOOKING.COM B.V.; BOOKING.COM (USA) INC., ROCKET TRAVEL, INC., MOMONDO A/S.
 	
               Defendants.
	Civil Action No. 7:21-cv-02691-CS

THE WAVE STUDIO, LLC,
               Plaintiff,
 	
 v.
 	
 SOUTHWEST AIRLINES CO., et al.
 	
               Defendants.
	Civil Action No. 7:22-cv-05141-CS

**THE BOOKING HOLDINGS DEFENDANTS' NOTICE OF MOTION AND MOTION
TO DISMISS ON SPECIFIED GROUNDS PER COURT'S ORDERS**

Defendants Booking Holdings Inc., Agoda Company Pte. Ltd., AGIP LLC, Booking.com BV, Booking.com (USA) Inc., Rocket Travel, Inc., Momondo A/S, Priceline.com LLC, Hotels Combined LLC, and Southwest Airlines Co. (the "Moving Defendants"), by and through their undersigned attorneys, hereby move this Court to dismiss claims asserted against them by Plaintiff The Wave Studio LLC with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) on the grounds that the claims are barred by the statute of limitations as follows:

- Defendants Booking Holdings Inc., Agoda Company Pte. Ltd., AGIP LLC, Booking.com BV, Booking.com (USA) Inc., Rocket Travel, Inc. and Momondo A/S as to all claims;

- Defendant Priceline.com LLC as to the 423 photographs identified on Exhibit G hereto;

- Defendant Hotels Combined LLC as to the 287 photographs identified on Exhibit H hereto; and

- Defendant Southwest Airlines Co. as to the seven photographs identified on Exhibit I hereto.

Defendants Agoda Company Pte Ltd. and Momondo A/S also move the Court to dismiss the claims asserted against them with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) on the additional ground that the claims are barred by the doctrine of extraterritoriality.

This Motion is based upon the pleadings, this Notice, the attached Memorandum of Law and Exhibits attached thereto, and upon such further oral and written argument as may be presented at or before any hearing on this matter and the Motion is deemed submitted.

This Motion is made pursuant to Magistrate Judge Reznik's September 5, 2024, October 21, 2024, and October 31, 2024, Orders (ECF Nos. 384, 409-410, and 421) regarding

early motions to dismiss to address only specified grounds (namely, statute of limitations, doctrine of extraterritoriality and personal jurisdiction). The Moving Defendants expressly reserve their right to file a further motion to dismiss on other grounds and any other permissible motion based on the statute of limitations and the extraterritoriality doctrine.

Dated: December 6, 2024   /s/ Carla B. Oakley

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